

## Clapham Discovery Response Chart

**Ex. D**

RFP	Content	Was It Provided	How do we know it exists?	Reference
1	All correspondence with Lenders relating in any way to FOL, including all communications with lenders concerning FOL's offer to resume payments on the loans in July 2020.	No	Clapham Whatsapp Message With Greg Hurley	Whatsapp: [10/07/2020, 00:34:29]
2	All correspondence with FOL, from October 1, 2017, to the present.	No	Clapham Whatsapp Message With Greg Hurley	Whatsapp: [10/07/2020, 00:34:29]
3	All documents and communications related to Your interactions with and participation in the Advisory Board.	Not all	Clapham Whatsapp Message With Greg Hurley	Whatsapp: [13/07/2020, 19:37:15]; [13/07/2020, 19:47:44]; [13/07/2020, 22:12:22]
4	All communications concerning FOL, any of the Lenders, the Advisory Board, Redemption or the Colorado Litigation.	No	Clapham Whatsapp Message With Greg Hurley	Whatsapp: <i>passim</i>
5	All communications with Alexander Capital concerning FOL, any of the Lenders, the Advisory Board, Redemption, or the Colorado Litigation.	No	Clapham Whatsapp Message With Greg Hurley	Whatsapp: <i>passim</i>
6	All communications with Provision concerning FOL	Unknown		
7	All documents related to Redemption, including but not limited to all correspondence with Redemption.	No	Clapham Whatsapp Message With Greg Hurley	Whatsapp: [09/08/2020, 20:54:11]
8	All correspondence with Fox Rothschild related to the SDNY Litigation or the Colorado Litigation.	Unknown	Messages were forward to Clapham from Hurley but not produced	
9	All correspondence with Hurley, Leonard, Alexander Capital, DaSilva, Fox Rothschild, DiMartini or Kelly relating in any way to FOL, any of the Lenders, the Advisory Board, Redemption, the Colorado Litigation or the SDNY Litigation	No	Clapham Whatsapp Message With Greg Hurley	Whatsapp: 05/08/2020, 22:20:08]
10	All correspondence with the FBI, FINRA or the SEC or any other state or federal regulator or agency related in any way to FOL, and all documents related to any inquiries, by the SEC, FINRA or any other state or federal regulator or agency related in any way to FOL.	Unknown		

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11	All communications between You and DiMartini.	No	Clapham Whatsapp Message With Greg Hurley	Whatsapp: [23/08/2020, 03:08:21]; [06/03/2021, 17:28:23]
12	All contracts between You and FOL.	No	Clapham asserts to be an equity holder	
13	All contracts between You and any of the Advisory Board, Fox Rothschild, Redemption, Hurley, Leonard, Alexander Capital, Truong, CMD, DaSilva or Kelly.	No	Depositions and document production from Redemption lawsuit	
14	All communications related to Your alleged investment in FOL.	No	Depositions and document production from Redemption lawsuit	
15	All documents reflecting Your alleged investment in FOL.	No	Clapham asserts to be an equity holder	
16	All communications with CMD related to Your alleged investment in FOL.		Clapham asserts to be an equity holder	
17	All documents reflecting the persons or entities who contributed to Your alleged investment in FOL.	No	Clapham Whatsapp Message (Bob); various phone calls with FOL stating that he invested his friends and family money in FOL	Whatsapp messages with Bob Bell 14/12/2023, 21:37:56]

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18	All account documents and statements with Alexander Capital.	No	Clapham has invested in FOL, Disaboom, and Stewart's Enterprises Holdings, Inc. through AC	
19	All communications You have had with or including DiMartini concerning any investment.	No	Clapham Whatsapp Message With Greg Hurley	Whatsapp: [12/11/2020, 23:54:39]; 07/03/2021, 13:44:50; [07/03/2021, 13:45:39]; [07/03/2021, 13:51:14]; [07/03/2021, 15:13:17]
20	All documents reflecting the terms of any investment you have made that involved DiMartini in anyway	No	Clapham Whatsapp Message With Greg Hurley	Whatsapp: passim
21	Documents showing all compensation provided to DeMartini related in any way to FOL	No	Clapham Whatsapp Message With Greg Hurley	Whatsapp:[12/11/2020, 23:54:39]
22	All documents all documents related to Provision's agreement to provide advertising services to FOL and borrow funds from FOL or intent to perform or not perform under Provisions contract with FOL.	Unknown		
23	All documents related to Your involvement in the FOL loan to and purchase of advertising services from Provision	Unknown		
24	All documents your contribution or investment in Provision	No	Leonard's disclosures	On 11/14/2018 and 11/23/2018, Clapham wire transfers a total of \$2mm from eTrade to Provision's bank account at Silicon Valley Bank.
25	All documents concerning any business dealings on which You have worked that involved Kelly in any way.	No	Clapham Whatsapp Message With Greg Hurley	Whatsapp: passim
26	All documents concerning any business dealings on which You have worked that involved Leonard in any way.	No	Clapham Whatsapp Message With Greg Hurley	Whatsapp:[23/08/2020, 02:14:51]; [23/08/2020, 03:08:21] ; 22/05/2022, 11:25:25

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RFP	Content	Was It Provided	How do we know it exists?	Reference
27	All documents concerning any business dealings on which You have worked that involved Truong in any way.	No	Clapham Whatsapp Message With Greg Hurley	Whatsapp: [12/08/2020, 20:26:26]; 23/08/2020, 02:14:; 02/09/2020, 16:39:18] ]
28	All documents concerning any business dealings on which You have worked that involved Hurley in any way.	No	Clapham Whatsapp Message With Greg Hurley	Whatsapp:
29	All documents concerning any business dealings on which You have worked that involved DaSilva in any way.	No	Clapham Whatsapp Message With Greg Hurley	Whatsapp: 17/02/2023, 13:03:37
30	All documents concerning any business dealings on which You have worked that involved DiMartini in any way.	No	Clapham Whatsapp Message With Greg Hurley	Whatsapp: passim
31	All documents relating to prior interactions or transactions with Peter DiChiara, or the CMD firm, including, but not limited to all engagement agreements you have signed with CMD.	Unknown	Wired funds to CMD to fund equity purchase	
32	All due diligence provided to you by Alexander capital concerning FOL or that you requested from Alexander capital concerning FOL.	No		
33	Records of all amounts paid by you to Redemption.	No	Clapham Whatsapp Message - Also see Hurley's Deposition saying Barrie Funded lawsuit	Whatsapp:10/07/2020, 23:23:23; 18/07/2020, 16:07:12
34	All documents reflecting your loan to redemption, including all efforts that you have made to collect that loan.	No	Clapham Whatsapp Message - Also see Hurley's Deposition saying Barrie Funded lawsuit	Whatsapp:10/07/2020, 23:23:23; 18/07/2020, 16:07:12
35	All Communications in which you transmitted any information about FOL to any person.	Unknown		

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RFP	Content	Was It Provided	How do we know it exists?	Reference
36	All communications with Jeremy Wysoki, or the Wysocki Law group, PC	No	Clapham Whatsapp Message With Greg Hurley	Whatsapp:05/08/2020, 21:49:24; 30/03/2021, 01:23:17; [30/03/2021, 01:24:22
37	All correspondence with the receiver who was to be appointed in the Colorado litigation.	No	Clapham Whatsapp Message With Greg Hurley	Whatsapp:29/09/2020, 12:22:58; 29/09/2020, 12:29:50; 30/09/2020, 21:50:43; 30/09/2020, 21:52:15
38	All correspondence or documents exchanged with Hurley related to the settlement between redemption and FOL.	No	Clapham Whatsapp Message With Greg Hurley	Whatsapp: 30/09/2020, 21:52:15; 09/03/2021, 21:57:03
39	All documents between your attorneys and Hurley concerning FOL	No	Clapham Whatsapp Message With Greg Hurley	Whatsapp: 29/09/2020, 13:14:28; 23/02/2021, 20:57:35

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RFP	Content	Was It Provided	How do we know it exists?	Reference
1	All correspondence with Lenders relating in any way to FOL, including all communications with lenders concerning FOL's offer to resume payments on the loans in July 2020.	No	E-mail with Greg Hurley	Leonard Disclosure E-mails
2	All correspondence with FOL, from October 1, 2017, to the present.	No	E-mail with FOL	ACLP010147
3	All documents and communications related to Your interactions with and participation in the Advisory Board.	No	E-mail with FOL	ACLP010147
4	All communications concerning FOL, any of the Lenders, the Advisory Board, Redemption or the Colorado Litigation.	No	E-mail with Greg Hurley	ACLP209827
5	All communications with Alexander Capital concerning FOL, any of the Lenders, the Advisory Board, Redemption, or the Colorado Litigation.	No	E-mail with Jonathan Gazdak	ACLP008482
6	All communications with Provision concerning FOL.	No	E-mail from FOL to Provision board and C-suite	ACLP037441
7	All documents related to Redemption, including but not limited to all correspondence with Redemption.	No	E-mail with Greg Hurley	Leonard Disclosure E-mails
8	All correspondence with Fox Rothschild related to the SDNY Litigation or the Colorado Litigation.	No	Unknown	
9	All correspondence with Hurley, Leonard, Alexander Capital, DaSilva, Fox Rothschild, DiMartini or Kelly relating in any way to FOL, any of the Lenders, the Advisory Board, Redemption, the Colorado Litigation or the SDNY Litigation.	No	E-mails	ACLP220963; 235884; 008482; 206123
10	All correspondence with the FBI, FINRA or the SEC or any other state or federal regulator or agency related in any way to FOL, and all documents related to any inquiries, by the SEC, FINRA or any other state or federal regulator or agency related in any way to FOL.	No	Unknown	
11	All communications between You and DiMartini.	No	E-mail with Frank DiMartini	ACLP221609
12	All contracts between You and FOL.	No	Alleges to be equity owner in FOL	

## Leonard Discovery Response Chart

RFP	Content	Was It Provided	How do we know it exists?	Reference
13	All contracts between You and any of the Advisory Board, Fox Rothschild, Redemption, Hurley, Leonard, Alexander Capital, Truong, CMD, DaSilva or Kelly.	No	Unknown	
14	All communications related to Your alleged investment in FOL.	No	E-mail from Jonathan Gazdak to Mark Leonard attaching invoice for commission	ACLP008609
15	All documents reflecting Your alleged investment in FOL.	No	E-mail from Jonathan Gazdak to Mark Leonard attaching invoice for commission	ACLP008608
16	All communications with CMD related to Your alleged investment in FOL.	No	E-mail with Pete DiChiara re: investment in FOL	ACLP008493
17	All documents reflecting the persons or entities who contributed to Your alleged investment in FOL.	No	Sent wire statements but not preceeding documents showing source of funds	
18	All account documents and statements with Alexander Capital.	No	Unknown	
19	All communications You have had with or including DiMartini concerning any investment.	No	E-mail with Frank DiMartini	ACLP221609
20	Documents showing all compensation provided to DiMartini related in any way to FOL.	Unknown	Unknown	
21	All documents related to Provision's agreement to provide advertising services to FOL and borrow funds from FOL or intent to perform or not perform under Provision's contract with FOL.	No	E-mail from FOL to Mark Leonard re: Provision advertising	ACLP222374-436; 8640
22	All documents related to Your involvement in the FOL loan to and purchase of services from Provision.	No	E-mail from FOL to Mark Leonard re: Provision advertising	ACLP222374-436; 230228
23	All documents related to Your contribution or investment in Provision.	No	Unknown	
24	All documents concerning any business dealings on which You have worked that involved Kelly in any way.	No	E-mail from Mark Leonard to Time Kelly re: reasons to invest in Provision	ACLP206123
25	All documents concerning any business dealings on which You have worked that involved Clapham in any way.	No	Wires Transfers from Barrie Clapham for \$2mm	Silicon Valley Bank Accounts statements

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RFP	Content	Was It Provided	How do we know it exists?	Reference
26	All documents concerning any business dealings on which You have worked that involved DaSilva in any way.	No	E-mail with Greg Hurley	Leonard Disclosure E-mails
27	All documents concerning any business dealings on which You have worked that involved Hurley in any way.	No	E-mail with Greg Hurley	Leonard Disclosure E-mails
28	All documents concerning any business dealings on which You have worked that involved Truong in any way.	No	Clapham Whatsapp Messages with Hurley; Bank statements showing payments to Truong	Whatsapp Messages; <i>passim</i>
29	All documents relating to prior interactions or transactions with Peter DiChiara or the CMD firm, including but not limited to all engagement agreements You have signed with CMD.	No	Wire Transfers from Provision to CMD	SVB Account Statements 12/2018
30	All due diligence provide to You by Alexander Capital concerning FOL or that You requested from Alexander Capital concerning FOL.	No	E-mail from Frank DiMartini forwarding confidential investor presentation; confidential e-mail sent from Frank DiMartini to Mark Leonard re: FOL cash flows	ACLP209827; ACLP210428
31	Records of all amounts paid by You to Redemption.	No		
32	All documents reflecting the creation or operation of Coil.	No		
33	All communications with Rainmaker Retail Group, LLC.	No	Lawsuit between Rainmaker and Mark Leonard	
34	All documents reflecting the use of funds paid by FOL to Provision.	No	Bank statements only	SVB Bank Statements
35	All documents reflecting the ownership of Provision.	No	Mark Leonard was CEO	No capital tables provided
36	All documents reflecting the existence of any agreement between Provision and Coinstar.	No	E-mail from Mark Leonard to Frank DiMartini attaching Provision Coinstar Partnership	ACLP204223
37	All communications with Coinstar regarding any use of Provision's goods or services.	No	Lengthy e-mail from Mark Leonard to Tim Kelly re: Provision	ACLP206123
38	All documents reflecting Ronald Barrie Clapham's contribution to Provision.	No	Bank statements only	SVB Bank Statements



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RFP	Content	Was It Provided	How do we know it exists?	Reference
39	All documents reflecting the existence of secured loans owed by Provision.	No	UCC Financing Statements	
40	All documents reflecting any obligation of Provision to pay Alexander Capital commissions or other remuneration for moneys loaned or paid by FOL to Provision.	No	Payments to Alexander Capital	SVB Bank Statements
41	All documents reflecting the basis for your acquisition of alleged equity in FOL.	No	E-mails	Hundreds of e-mails on the subject
42	All documents reflecting Your purchase and sale of equity in FOL.	No	E-mails	Hundreds of e-mails on the subject
43	All communications with DiMartini concerning FOL or FOL's products.	No	E-mail with Frank DiMartini	ACLP221609
44	All communications with Alexander Capital concerning Your alleged ownership of shares of FOL.	No	E-mail from Mark Leonard to Jonathan Gazdak	ACLP008482
45	All communications with Truong regarding FOL or Redemption.	No	Clapham Whatsapp Messages with Hurley	
46	All communications with Truong regarding Limelight Automated Retail.	No	Unknown	
47	All documents reflecting Your ownership in Redemption.	No	Clapham Whatsapp Messages with Hurley	
48	All communications with any of the Lenders.	No	E-mails with Lenders	<i>Passim</i>
49	All engagement agreements between You and CMD.	No	Unknown	
50	All communications with Mark Ward or Wasatch Labs concerning the manufacture of CBD products.	No	Unknown	Meeting with Mark Ward
51	All documents related to the formation of Above Holdings Inc., including documents showing the owners of the aforementioned company.	No	Secretary of State filings	Articles showing creation
52	All communications with Connie Kondick, Nael Karim Kassar, Antoine Sacy, or Tony Ettinger concerning the creation or operation of a CBD brand or company.	No	Unknown	
53	All communications with Hurley concerning the settlement between Redemption and FOL.	No	Settlement Agreement	Required to have sent to Mark Leonard